



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

March 9, 2015

Commander U.S. Army Garrison Fort Campbell  
Attn: NEPA Program Manager  
Building 2159, 13<sup>th</sup> Street  
Ft Campbell, KY 42223

Subject: DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT (DPEIS)  
FOR FORT CAMPBELL KY, TRAINING MISSION AND MISSION SUPPORT  
ACTIVITIES.

Dear Mr. Gene A. Zirkle:

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the U. S. Army Garrison Fort Campbell, KY Training Mission and mission Support Activities Draft Programmatic Environmental Impact Statement. Under Section 309 of the CAA, EPA is responsible for reviewing and commenting on major federal actions significantly affecting the quality of the human environment.

**Background:**

A Fort Campbell installation-wide mission evaluation was last performed in 1981 and documented in the EIS. It was titled *101st Airborne Division (Air Assault) and Fort Campbell, Kentucky Final Environmental Impact Statement Installation Ongoing Mission* (Fort Campbell, 1981). Since then, there have been numerous advances to the type of Soldier training, equipment, and units that train at Fort Campbell. Recent Army-wide mission changes (i.e., Army Transformation, Modularity, Grow the Army) have occurred at Fort Campbell, which has resulted in various stationing actions (growth) since 2004. These specific actions have been analyzed in previous NEPA documentation. Although these evolutions have occurred in compliance with federal regulations, statutes, and Executive Orders (EOs), Fort Campbell is conducting an update to the 1981 Installation Ongoing Mission EIS. This update looks at the environmental effects of continuing the ongoing mission of Fort Campbell, efforts to modernize and improve facilities, as well as proposed enhanced environmental procedures aimed at increasing efficiency. The following are Fort Campbell's five primary objectives:

1. Help meet the primary range complex objectives outlined within the RCMP through the creation of modern facilities or upgrades to existing training infrastructure.
2. Help meet the primary training land objectives outlined within the RCMP through the creation of training infrastructure or upgrades to existing training infrastructure.
3. Streamline the review of routine range and training land actions.

4. Provide the airspace necessary to train units at Fort Campbell and to reduce scheduling conflicts.
5. Meet requirements of the Sustainable Range Program (SRP) and foster environmental stewardship.

EPA understands that under this Draft PEIS, the 5 alternatives or proposed action presented, including the no action alternative, will have no significant impacts to geology, topography, soils, air, wetlands or groundwater supplies.

#### **EPA's Concerns:**

Noise impact is EPA's primary concern. The preferred alternative 5, involves the construction and operation of the facilities. There is a potential to generate noise during the construction and operational phase. Also alternative 4 would increase the potential for noise generation beneath the restructured and expanded airspace. Both alternatives 4 and 5 have the potential to significantly affect the noise environment of sensitive receptors. EPA recommends Best Management Practices (BMP) for construction noise. The Federal Aviation Administration (FAA) determines noise exposure at or above 65 DNL to be incompatible with residential land use. According to the DPEIS, significant change in noise exposure to local residents is predicted for some alternatives. EPA recommends Fort Campbell conduct a comprehensive noise modeling survey where necessary to determine the specific impacts. EPA recommends the Final Programmatic EIS (FPEIS) discuss mitigation to address residential noise exposure and the prospective Record of Decision should provide commitment targets for residential mitigation. Recommendations include: 1) residential mitigation (soundproofing) starting with those residences located in the highest (noisiest) contours; 2) greater use of other available airfield runways and range firing points as weather and airfield operations permits.

EPA is particularly concerned over noise impacts to children per Executive Order 13045: *Protection of Children from Environmental Health Risks and Safety Risks*. E.O. 13045 recognizes children may suffer disproportionately from environmental health risks and safety risks. Because their smaller ear canals magnify the sounds entering the ear canals, children's hearing may be particularly sensitive. For example, a 20-decibel difference can exist between adult and infant ears.<sup>1</sup> All five alternatives analyzed in the DPEIS, including the no action alternative, indicate no noise impacts to children. While the DPEIS alternatives analysis discussed schools, (including day-care centers) potentially impacted at or greater than 65 DNL, it did not discuss the actual number of potential children, e.g., students, residents, etc., exposed to noise impacts or identify mitigation measures to diminish the noise impacts. Consequently, the FPEIS should identify the population of children, analyze potential noise impacts upon them, and identify mitigation alternatives if necessary.

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<sup>1</sup> [www.childrenshearing.org/custom/hearing\\_health.html](http://www.childrenshearing.org/custom/hearing_health.html)

After all public and agency comments are considered, explore and objectively evaluate all reasonable alternatives.

In summary, EPA has environmental concerns regarding this project, as proposed, and rates this draft EIS as "EC-2" (*i.e.*, environmental concerns with additional information requested in the final EIS). EPA is requesting our comments be addressed and additional information in the FPEIS as stated in the paragraph above.

Thank you for the opportunity to review and provided comments. If you wish to discuss this matter further, please contact Larry O. Gissentanna (404-562-8248 or [gissentanna.larry@epa.gov](mailto:gissentanna.larry@epa.gov)) of my staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", written in a cursive style.

Heinz J. Mueller, Chief  
NEPA Program Office  
Resource Conservation Recovery Division

Enclosures: Summary of Rating Definitions